

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRISTIAN DAL BOSCO, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

NRX PHARMACEUTICALS, INC.,
JONATHAN C. JAVITT, and WILLIAM
FRICKER,

Defendants.

Case No. 1:22-cv-00066-MN

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
APPOINTING LEAD PLAINTIFF AND LEAD COUNSEL**

WHEREAS, five motions for appointment of lead plaintiff and appointment of lead counsel were filed on the March 21, 2022 statutory deadline in the above-captioned securities class action brought pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) on behalf of investors in NRX Pharmaceuticals, Inc. by the following movants in order of claimed financial interest: Jason Karnes and Ian Dingwall (D.I. 9); Larry D. Creasy Jr. (D.I. 3); Iberia Capital Corp. (D.I. 12); Hassan El Hakim (D.I. 15); and Barbara Patane (D.I. 6);

WHEREAS, Barbara Patane withdrew her motion on March 22, 2022 (D.I. 18);

WHEREAS, Iberia Capital Corp. filed a Notice of Non-Opposition on March 29, 2022 (D.I. 25) and Hassan El Hakim filed a Notice of Non-Opposition on April 5, 2022 (D.I. 26);

WHEREAS, Messrs. Karnes, Dingwall, and Creasy have concluded that a protracted dispute concerning lead plaintiff appointment in this action is not in the best interests of the class and that jointly prosecuting this litigation as a triumvirate of the movants claiming the largest claimed stock, options, and warrant financial interests would ensure broad coverage of the putative class’ claims and aid the speedy prosecution of this litigation;

WHEREAS, Messrs. Karnes, Dingwall, and Creasy have agreed to resolve their competing motions and to seek, with the Court's approval, to serve collectively as lead plaintiff; and

WHEREAS, Messrs. Karnes, Dingwall, and Creasy are committed to supervising the conduct of this litigation by their counsel and to ensuring that counsel coordinate appropriately and avoid any duplication of effort in the conduct of the litigation.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Pursuant to the PSLRA, 15 U.S.C. §78u-4(a)(3)(B), Messrs. Karnes, Dingwall, and Creasy are appointed as Lead Plaintiffs;
2. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Robbins Geller Rudman & Dowd LLP and Pomerantz LLP are approved as Lead Counsel in the Consolidated Action;
3. Pursuant to D. Del. LR 83.5(d), Andrews & Springer LLC and Bielli & Klauder, LLC are approved as Delaware Counsel in the Consolidated Action; and
4. The motions at D.I.'s 6, 12, and 15 are TERMINATED AS MOOT.

ANDREWS & SPRINGER LLC

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Dated: April 5, 2022

* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE MARYELLEN NOREIKA
UNITED STATES DISTRICT JUDGE